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January 23, 2025

Via Electronic Filing

Hon. Glenn T. Suddaby
United States District Court
Northern District of New York
P.O. Box 7367
Syracuse, New York 13261

Re: *Matthew Raymond v. Troy Mitchell, et al*, No. 18 Civ. 01467 (GTS)(MJK)

Dear Judge Suddaby,

We represent Plaintiff Matthew Raymond in this case. We write on behalf of all parties to request that the Court allow the parties an additional month to file a Stipulation of Dismissal, by no later than February 24, 2025.

Background

Pursuant to the Court's Text Order of October 23, 2024, the Court directed the parties "to file a Stipulation of Dismissal by January 24, 2025, or in the alternative, to advise this Court why it should not issue an Order dismissing this case by reason of settlement without prejudice with the right to reinstate the case should the settlement not be consummated." ECF No. 192.

As set forth at ECF Nos. 90 and 91, the parties agreed to settle the plaintiff's claims for damages following a settlement conference with Magistrate Judge Katz, but there was an outstanding issue with a Medicaid lien being asserted against Plaintiff's recovery that required resolution before the settlement could be finalized. Since the parties last wrote to the Court, we have met again with Magistrate Judge Katz, *see* ECF No. 93, and Plaintiff has made substantial progress towards resolving the Medicaid lien issue. We require a brief extension of time to complete negotiations with Medicaid (and then between the parties should any lien amount remain), and also to allow the parties to determine if they can agree to an amount for Plaintiff's attorneys' fees and costs, or whether an application will need to be filed for the same.

For these reasons, we respectfully request on behalf of all parties that the Court allow an additional month for the parties to file a Stipulation of Dismissal, by no later than February 24, 2025.

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The Court's ongoing attention to this case is appreciated.

Very truly yours,

Katherine Rosenfeld
Sam Shapiro

c. Patrick Mackey, Esq. (via email)